



09/22/05

1621 West Broad St  
Richmond, VA 23220  
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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

In the Matter of: )

)

) **MM Docket No. 99-25**

Creation of a Low )

Power Radio Service )

**REPLY-COMMENTS OF VIRGINIA CENTER FOR PUBLIC PRESS (WRIR-LP)**

The Virginia Center for Public Press (VCP) is the licensee of WRIR-LP

WRIR-LP is the nation's largest *community* LPFM. It is important to note the word community because local community representation is the heart and soul of the LPFM service. The signal of WRIR-LP covers about a quarter million population almost perfectly matching the contours of the city of Richmond Virginia. As a partial result of this coverage, WRIR-LP is being considered for the honor of serving as the emergency communication station for the City of Richmond Virginia in times of disaster as declared by the Mayor under a plan funded by the Department of Homeland Security.

WRIR-LP is to our knowledge, the *only* LPFM station to carry NPR live programming from the PRSS satellite system. We have news and talk programming including 14 local news and talk shows every weekday from 8am to 5pm and have shows as varied as Louisiana Zydeco and Congolese music as well as Folk, Techno, Rap and Soul and Caribbean Gospel. As such we seek to create a forum for voices that would otherwise go unheard in the community of Richmond Virginia and provide a place for everyone at the table of democracy and thus create a more unified public during times of distress. This strengthens both the individuals of America in our community as well as The Union.

The VCP has also submitted numerous comments in proceedings on LPFM going back several years now.

**The VCP hereby announces we support in large part the comments of Prometheus Radio Project and the Amherst Alliance.**

We may respectfully differ slightly inasmuch as :

1. we think that if there are people in Virginia who are unserved by existing media, but do not have the means to create LPFM exist, we would like to be able to build several more LPMs across Virginia for those communities to produce local programming as well as perhaps (at their discretion and in agreement) share programming with us. Any such LPFM should have a strong component of locally produced programming. "Locally Produced" should mean actually recorded on a microphone and edited there at the local station in question. To be community radio, it should serve audiences in that community that are unserved by any other stations already receivable in that community and thus provide an audience that will go to the effort to receive such a weak signal as an LPFM is and thus create the constituency that will make that LPFM fiscally, culturally viable in the civic fabric.



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2. We think that there are cases where an LPFM should be able to use translators to fill in areas that are blocked by co-channel interference (due to the relatively unique situation of a Grandfathered Superpowered station) and/or physical obstacles such as a downtown "ridge" of buildings. WRIR-LP has about 5000 listeners now in spite of facing such obstacles and if we become the emergency information and news provider for the City Of Richmond, it would be helpful to have a translator behind some of said physical obstacles. If it were not for said obstacles, we would already serve those audiences better with a regular LPFM transmitter facility. Please note that translators need reform as provided for in Amherst and Prometheus comments and other than our respectful difference cited in this paragraph, any LPFM owned translator should abide by the same restrictions.

It would also help to codify a wider latitude to move to a different frequency or location in order to reduce interference (such as we are experiencing from a Grandfathered Superpowered co-channel) as provided in Prometheus Radio comments. This should also include a special attention to interference caused by IBOC-DAB as it comes online with adjacent channel interference.

It is also important that LPFM stations have Primary Status for in many cases LPFM is providing service that is IRREPLACEABLE by other stations as demonstrated by their actions over the last several decades. As the Bible says, "By Their Fruits Ye Shall Know Them." If the other stations had done such a good job of serving the truly diverse populations of America, the support that created LPFM would never provided well over 10,000 comments to the FCC on LPFM in this round alone!

Thank-you for taking the time to read over 10,000 comments and reply comments such as ours.

Sincerely, Christopher Maxwell  
President: Virginia Center for Public Press  
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